

EXHIBIT C

DECLARATION AND VERIFICATION OF JOHN HUMPHRIES

Declaration and Verification of John Humphries


I, John Humphries, hereby declare, under penalty of perjury, as follows:

1. I am greater than eighteen years of age and am competent to make this Declaration and Verification.
2. I am the President and General Manager of WYFF(TV) (“WYFF”), Greenville, South Carolina, and I have held this position since July 2016. I also served as Director of Sales for WYFF from 2006 to 2012.
3. WYFF is the NBC affiliate for the Greenville-Spartanburg-Asheville-Anderson Designated Market Area. WYFF serves four counties located in Georgia, including Stephens County, Franklin County, Elbert County, and Hart County.
4. WYFF has been carried on DISH and DIRECTV in Stephens County, Georgia, at least since each launched local-into-local service in the Greenville-Spartanburg-Asheville-Anderson DMA. WYFF is carried on Channel 4 on DISH and on Channel 4 on DIRECTV in Stephens County.
5. WYFF regularly provides local news, weather, school closings, traffic and EAS alerts, and other information of local interest to the residents of Stephens County and the other three Georgia Counties in the Greenville-Spartanburg-Asheville-Anderson DMA. Since June 2017, WYFF has aired dozens of stories focused on Stephens County, Franklin County, Elbert County, Hart County, and their communities. Some recent examples are attached to this Declaration as Attachments 1, 2, and 3.
6. I verify that the factual matters contained in the foregoing Joint Opposition to Petitions for Special Relief are true and correct to the best of my information, knowledge, and belief.

[signature appears on the following page]

I declare, under penalty of perjury, that the foregoing Declaration and Verification is true and accurate to the best of my knowledge, information, and belief.

12/20/2018
Date


John Humphries
President and General Manager
WYFF(TV)

ATTACHMENT 1

EXAMPLES OF WYFF PROGRAMMING COVERING STEPHENS COUNTY

Elections results for Georgia Primary

Stacey Abrams has won the Democratic primary in Georgia's gubernatorial race



Updated: 11:08 PM EDT May 22, 2018



County results for Georgia primary



Updated: 7:10 AM EDT May 22, 2018

Stephens Co. Commissioner Post 4 GOP			
Candidate	Party	Votes	Percentage
James Addison	R	1,039	40%
Bryan Dooley	R	755	29%
Jim Ledford	R	467	18%
Henry Moore	R	196	8%
Melvin Barrett	R	126	5%
Total		2,583	
0% 100% 100% Reporting 3 of 3 Precincts			

Stephens Co. Commissioner Post 5 GOP			
Candidate	Party	Votes	Percentage
★ Dean Scarborough	R	1,517	58%
John Smith	R	1,087	42%
Total		2,604	
0% 100% 100% Reporting 3 of 3 Precincts			

Stephens Co. Board of Education Dist. 3 Post 1 GOP			
Candidate	Party	Votes	Percentage
★ Kay Reed	R	1,400	55%
Joel Blackwell	R	1,146	45%
Total		2,546	
0% 100% 100% Reporting 3 of 3 Precincts			

Stephens Co. Sunday Alcohol Sales			
Candidate	Party	Votes	Percentage
★ Yes		1,573	50%
No		1,562	50%
Total		3,135	
0% 100% 100% Reporting 3 of 3 Precincts			

Toccoa Sunday Alcohol Sales			
Candidate	Party	Votes	Percentage
★ Yes		478	52%
No		449	48%
Total		927	
0% 100% 100% Reporting 3 of 3 Precincts			

ATTACHMENT 2

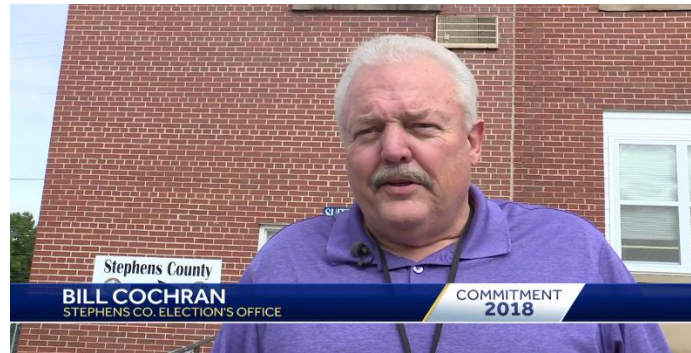
LIST OF WYFF STORIES COVERING STEPHENS, ELBERT, FRANKLIN, AND HART COUNTIES

DATE	COUNTY	STORY SLUG	SEGMENT
11/9/2018	Stephens County	Stephens County Ballots	FONT
10/17/2018	Stephens County	Early Voting Stephens County	VO/SOT
5/22/2018	Stephens County	Stephens County Alcohol Sales	FONT
5/16/2018	Stephens County	Toccoa Sinkhole	VO
11/14/2017	Stephens County	Missing Teen	FONT
6/22/2017	Stephens County	Toccoa Tornado	VO
6/16/2017	Stephens County	County Line Movie Premiere	VO
8/6/2018	Hart County	Strong Storms	WX
7/24/2018	Hart County	Primary Election Runoff	VO
6/15/18	Hart County	Grandmother Kills Bobcat	PKG
5/22/2018	Hart County	Ga Hart Alcohol Sales	PKG
5/14/2018	Hart County	Officer involved shooting	Sky 4 VO
4/29/2018	Hart County	Hart CO Firefighters	FONT
4/12/2018	Hart County	GBI arrests of Hart CO man in Ariz on Child Molestation charges	FONT
3/14/2018	Hart County	Highway 29 Hart CO Fatal car wreck	VO
9/10/2017	Hart County	Hart and Franklin Closed due to hurricane	School Ticker
8/2/2017	Hart County	Hart Co dog mauling	FONT
7/20/2017	Hart County	Dads store robbed	FONT
7/17/2017	Hart County	Missing boaters boat runs aground in Hart co on Lake Hartwell	VO/PKG
6/20/2017	Hart County	Hart co business arson fire	VO
5/21/2018	Elbert County	Elbert County Train Crash	FONT
3/16/2018	Elbert County	Elbert HS Student Arrest	FONT
1/11/2018	Elbert County	Elbert County Murder Arrest	SIDE PANEL
12/15/2017	Elbert County	Tree Shaped Cell Tower	PKG
10/6/2017	Elbert County	Elbert County Homicide	MAP
7/20/2017	Elbert County	Granite Death	FONT
6/14/2017	Elbert County	Georgia Prison Escapes	VO
5/22/2018	Franklin County	Franklin County Jail Referendum	FONT
5/14/2018	Franklin County	Deputy Involved Shooting	VO/SOT
1/22/2018	Franklin County	Teri Program	VO
12/23/2017	Franklin County	Murder Suicide	MAP

11/30/2017	Franklin County	Franklin County Assault and Stalking	MAP
11/22/2017	Franklin County	Franklin County Death Investigation	MAP

ATTACHMENT 3
SCREENSHOTS OF WYFF STORIES COVERING
STEPHENS, ELBERT, FRANKLIN, AND HART COUNTIES (NEWS, ELECTION, AND
WEATHER COVERAGE)

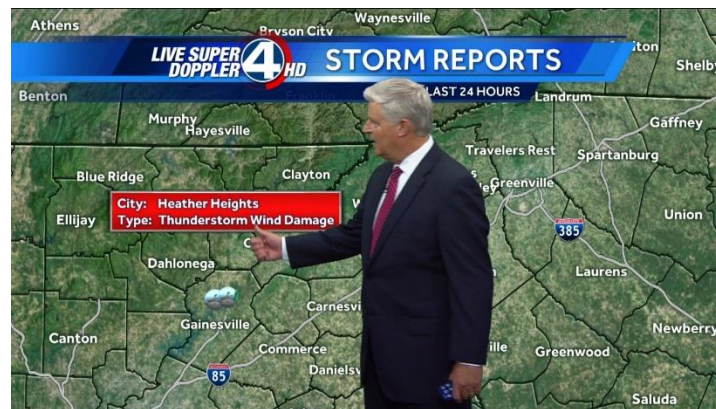
NEWS COVERAGE

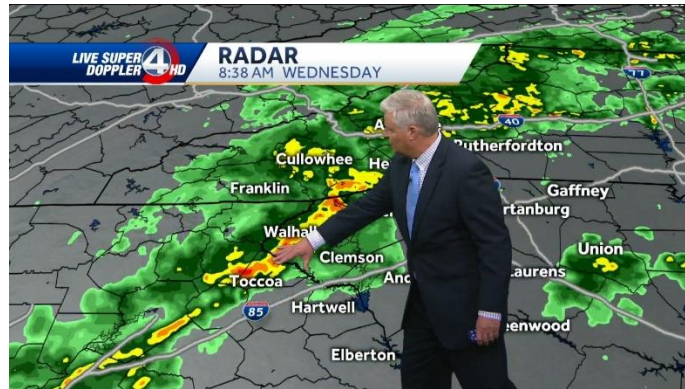
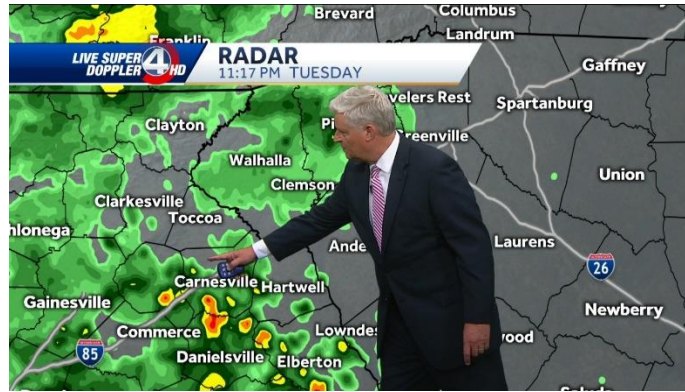






WEATHER COVERAGE

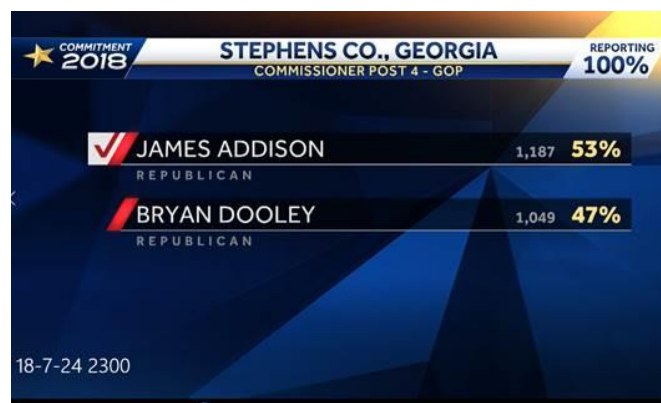
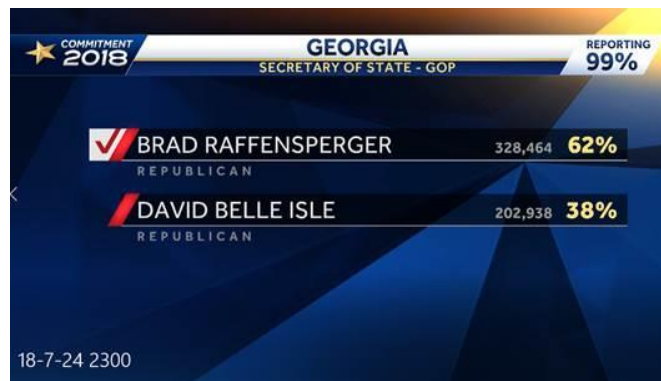


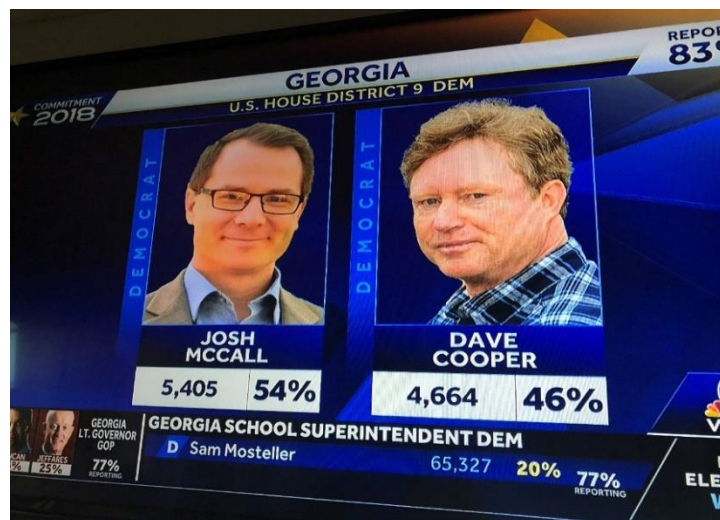
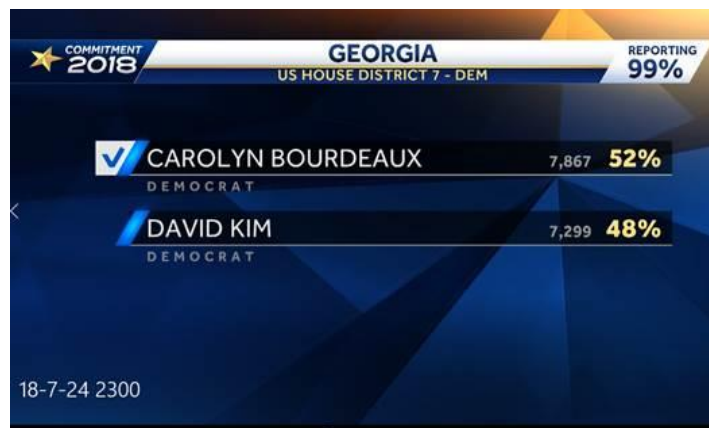


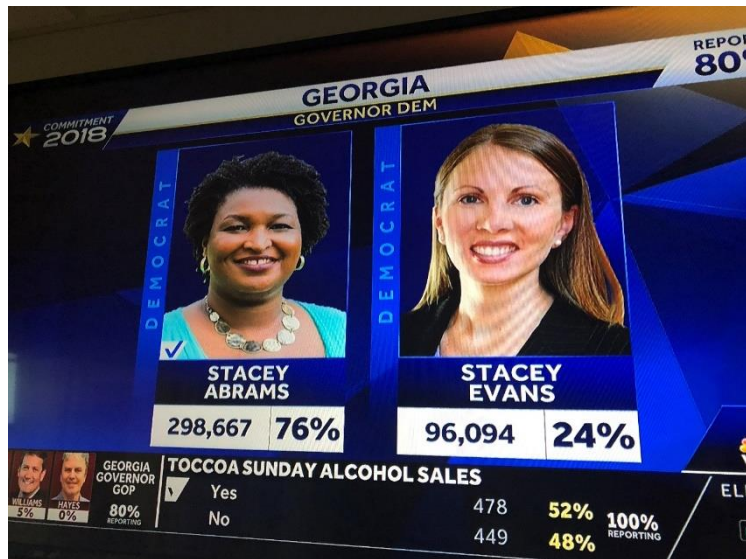


ELECTION COVERAGE









COMMITMENT 2018

GEORGIA GOVERNOR DEM
 80% REPORTING
 EVANS 24%

STEPHENS CO. COMMISSIONER POST 5 GOP

✓ R Dean Scarborough	1,517	58%	100% REPORTING
R John Smith	1,087	42%	

RADAR & TEMPERATURES
 9:41 PM TODAY

JOHN CESSARICH
 CHIEF METEOROLOGIST

GEORGIA LT. GOVERNOR DEM
 79% REPORTING
 AMICO 55% JAMES 45%

RABUN CO. BOARD OF EDUCATION POST 1 GOP

✓ R Curtis Haban	1,986	70%	100% REPORTING
R Avery Anderson	856	30%	

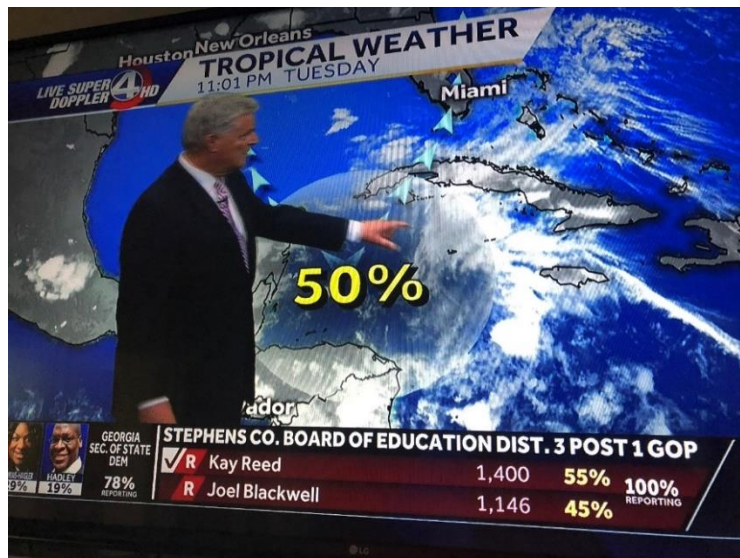
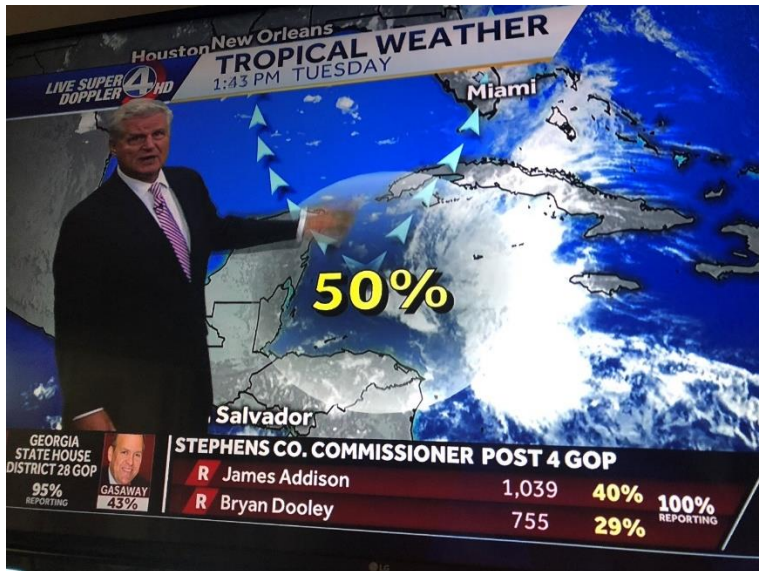
TROPICAL WEATHER
 11:01 PM TUESDAY

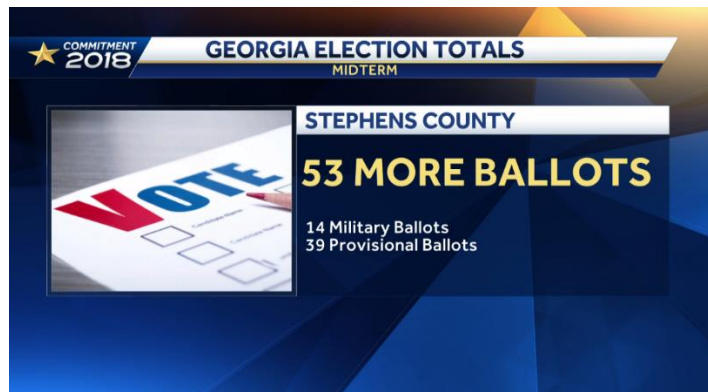
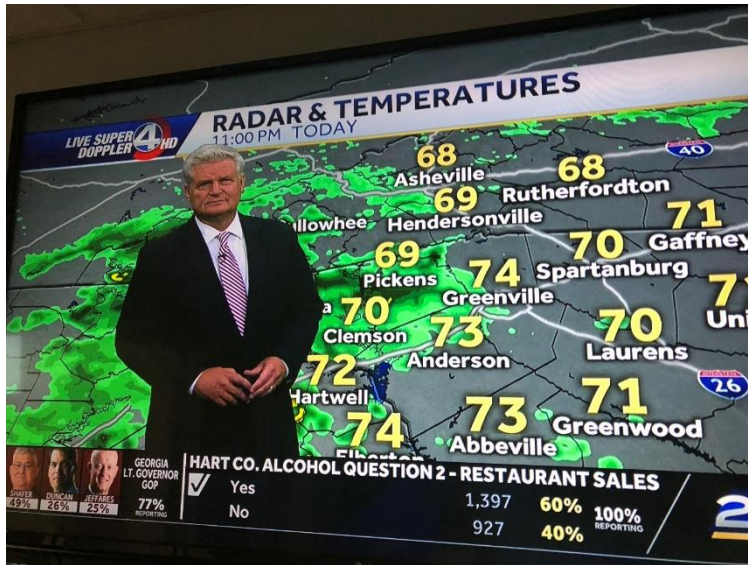
50%

GEORGIA STATE HOUSE DISTRICT 28 GOP
 95% REPORTING
 GASAWAY 45%

STEPHENS CO. COMMISSIONER POST 4 GOP

R Jim Ledford	467	18%	100% REPORTING
R Henry Moore	196	8%	





FRIDAY

SKY 4

MUDSLIDES DAMAGE 40 STRUCTURES IN WESTERN NORTH CAROLINA

GEORGIA U.S. HOUSE DISTRICT 9 DEM

COOPER 46% 83% REPORTING

FRANKLIN COUNTY JAIL BOND REFERENDUM

Yes	885	33%	100% REPORTING
No	1,822	67%	

WYFF 4

NON ELECTION WYFF

FRIDAY

SKY 4

MUDSLIDES DAMAGE 40 STRUCTURES IN WESTERN NORTH CAROLINA

GEORGIA GOVERNOR GOP

80% REPORTING

FRANKLIN CO. BOARD OF EDUCATION POST 5 GOP

✓ R Robin Cato	1,330	57%	100% REPORTING
R David Mayfield, Sr.	1,020	43%	

WYFF 4

ELECTION REPORT ON THE

SEARCH:

FRIDAY

SKY 4

WYFF 4


FRANKLIN CO. BOARD OF EDUCATION POST 3 GOP

✓ R Randall Gailey	1,209	52%	100% REPORTING
R Jeremy Madden	1,105	48%	

WYFF 4

ELECTION REPORT ON THE

SEARCH:



WINGING IN THE BALANCE



GEORGIA GOVERNOR
GOP

80%
REPORTING

✓ R

Lee Vaughn

1,399

68%

R

Frank Eaves

650

32%

ELBERT CO. BOARD OF COMMISSIONERS CHAIRPERSON

GOP

100%
REPORTING

4

WYFF

WYFF NEWS